

EXHIBIT A

EXHIBIT A

Pursuant to the Court's Case Management Order [Dkt. No. 291] and Patent L.R. 4-3, the parties submit the following chart identifying one term with an agreed construction, and six disputed claim terms for construction by the Court, along with each side's proposed constructions and supporting intrinsic and extrinsic evidence.

Agreed Constructions

	Claim Term, Phrase, or Clause	Agreed Construction
1.	"first and second semiconductor regions"	at least one first semiconductor region and at least one second semiconductor region

Disputed Constructors

	Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence¹	Volterra's Proposed Construction and Supporting Evidence²³
1.	"first metal conductors"	plain and ordinary meaning	a first/second part of the final metal layer

¹ Where Infineon cites to a particular drawing or figure in the accompanying charts, the citation encompasses the description of the drawing or figure, as well as any text associated with the drawing or figure. Similarly, where Infineon cites to particular text concerning a drawing or figure, the citation encompasses that drawing or figure as well. Infineon reserves the right to cite to any evidence identified by Volterra. Infineon reserves the right to amend or otherwise supplement its identification of supporting intrinsic and extrinsic evidence.

² Where Volterra cites to a particular drawing or figure in the accompanying charts, the citation encompasses the description of the drawing or figure, as well as any text associated with the drawing or figure. Similarly, where Volterra cites to particular text concerning a drawing or figure, the citation encompasses that drawing or figure as well. Volterra reserves the right to cite to any evidence identified by Infineon. Volterra reserves the right to amend or otherwise supplement its identification of supporting intrinsic and extrinsic evidence.

³ Just hours before this document was due to be submitted, Infineon disclosed that it intended to rely on documents with the "PRIM" Bates label prefix, which have not been produced in this lawsuit, and identified additional supporting evidence for the first time. Volterra reserves the right to make further revisions and cite to other documents as appropriate.

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
“second metal conductors”	<p><u>Intrinsic Support:</u> Specification of the '730 Patent: Abstract; 2:46-50; 3:30-37; and 3:57-4:6. Figures 1, and 4-5.</p> <p><u>Extrinsic Support:</u> conductor: “A substance or medium that conducts heat, light, sound, or esp. an electric charge.” <i>The American Heritage College Dictionary</i> (3rd ed. 1993).</p> <p>conductor: “a material or object that permits an electric current to flow easily” <i>Merriam-Webster’s Collegiate Dictionary</i> (10th ed. 1993).</p> <p>conductor: “a material that permits an electric current to flow easily” <i>Merriam-Webster’s Desk Dictionary</i> (1995).</p> <p>conductor: “A thing which conducts or forms a channel for the passage of something; esp. a substance or device which conducts heat or electricity” <i>The New Shorter Oxford English Dictionary</i> (Vol. 1 1993).</p> <p>INF003742, INF003745, INF003750, and INF003754.</p>	<p><u>Intrinsic Support:</u> '730 Patent at Abstract, 1:12-15, 1:48-55, 1:55-58, 2:36-42, 2:46-62, 3:1-11, 3:24-28, 3:29-43, 3:49-51, 3:57-4:4, 4:7-15, 4:15-29, 4:41-44, 4:67-5:3, Figs. 1, 4, 5, 6</p> <p><u>Extrinsic Support:</u> Volterra may rely on the discussions or disclosures regarding an under bump metallization (UBM) layer and the design and layout of semiconductors in the publicly available version of Volterra’s Opening Claim Construction Brief at pages 5-6 from Case 3:08-cv-05129-JCS (D.E. 502) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding an under bump metallization (UBM) layer and the design and layout of semiconductors in the publicly available version of Volterra’s Supplemental Reply Claim Construction Brief at pages 4-6 from Case 3:08-cv-05129-JCS (D.E. 595) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding an under bump metallization (UBM) layer and the design and layout of semiconductors in the publicly available version of the Claim Construction</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
	<p>Testimony of Dr. Leonard Schaper regarding claim construction.</p> <p>Infineon may rely on Volterra's expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>	<p>Order at pages 17-20 from Case 3:08-cv-05129-JCS (D.E. 697) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding an under bump metallization (UBM) layer and the design and layout of semiconductors in the publicly available version of Volterra's Motion for Summary Judgment of No Anticipation at pages 7-9 from Case 3:08-cv-05129-JCS (D.E. 925) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding an under bump metallization (UBM) layer and the design and layout of semiconductors in the publicly available version of the Order Re Summary Judgment Motions at pages 65-66, 70-72 from Case 3:08-cv-05129-JCS (D.E. 1502) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding an under bump metallization (UBM) layer and the design and layout of semiconductors in the publicly available version of the Szepesi Rebuttal Declaration in Support of Volterra's Reply Claim Construction Brief at pages 13-17 from Case 3:08-cv-05129-JCS (D.E. 562) for this term.</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
		<p>Volterra may rely on the discussions or disclosures regarding an under bump metallization (UBM) layer and the design and layout of semiconductors in the 2010-03-01 Amendment, Interview Summary, and Response to Office Action at pages 29-33 from the Reexamination of U.S. Patent No 6,278,264, and the Declaration of Dr. Thomas Szepesi at pages 6-10, 26-35 and the Declaration of Jean-Paul Clech at pages 17-18 from the Reexaminations of U.S. Patent Nos. 6,462,522 and 6,278,264 for this term.</p> <p>Volterra may also rely on any characterizations of the Sicard Patent made by Infineon or any of its subsidiaries in any of the above for this term.</p> <p>Volterra may rely on the definitions of “metalized pad” in 08-03-2009 Volterra’s Preliminary Claim Constructions and Extrinsic Evidence Pursuant to Patent Local Rule 4-2 from Case 3:08-cv-05129-JCS for this term.</p> <p>Testimony of Dr. Thomas Szepesi regarding claim construction.</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
		<p>“The abstract of Japanese patent JP 61/201477 shows an FET architecture wherein metal layers (6) are formed on the contacts of the electrodes (3, 4, 5) to enhance the adhesion of the gold-plated traces (7). In no case does this document show first and second metal conductors respectively coupled to first and second regions, each of the conductors being in contact with bumps.”</p> <p>[handwritten:] [illegible]</p> <p>French FH VCA00001865</p> <p>Chapters 1, 4, 6, Chip On Board Technologies for Multichip Modules, John H. Lau (1994).</p> <p>VCA00003062-3229.</p> <p>Volterra may rely on expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>
2. “bump”	<p>raised metal contact</p> <p><u>Intrinsic Support:</u> Specification of the '730 Patent: 2:50-58; 3:13-17; 4:7-12; and 4:24-28. Figures 1 and 4-7.</p>	<p>a raised metal structure formed partially on the final metal layer through an opening of a passivation layer</p> <p><u>Intrinsic Support:</u> '730 Patent at Abstract, 1:37-40, 1:48-55,</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
	<p><u>Extrinsic Support:</u></p> <p>INF003737, INF003763-INF003768, INF003783-INF003786.</p> <p>Testimony of Dr. Leonard Schaper regarding claim construction.</p> <p>Infineon may rely on Volterra's expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>	<p>1:66-2:5, 2:48-58, 3:1-11, 3:13-20, 3:29-43, 3:44-56, 3:57-4:6, 4:7-29, 4:30-37, 4:37-49, 4:50-54, 4:58-60, 4:61-67, 5:4-11, Figs. 6, 7, Claims 9, 10</p> <p><u>Extrinsic Support:</u></p> <p>Volterra may rely on the discussions or disclosures regarding metal bumps, solder balls, solder bumps and bonding and connection technologies in the publicly available version of Volterra's Opening Claim Construction Brief at pages 7-8 from Case 3:08-cv-05129-JCS (D.E. 502) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding metal bumps, solder balls, solder bumps and bonding and connection technologies in the publicly available version of the Claim Construction Order at page 22 from Case 3:08-cv-05129-JCS (D.E. 697) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding metal bumps, solder balls, solder bumps and bonding and connection technologies in the publicly available version of Volterra's Motion for Summary Judgment of No Anticipation at page 8 from Case 3:08-cv-05129-JCS (D.E.</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
		<p>925) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding metal bumps, solder balls, solder bumps and bonding and connection technologies in the publicly available version of the Order Re Summary Judgment Motions at pages 70-72, 74-75 from Case 3:08-cv-05129-JCS (D.E. 1502) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding metal bumps, solder balls, solder bumps and bonding and connection technologies in the 2009-04-06 Replacement Request For Ex Parte Reexamination of U.S. Patent No. 6,278,264 at page 32 and 2010-03-01 Amendment, Interview Summary, and Response to Office Action at pages 29-33, 39 from the Reexamination of U.S. Patent No 6,278,264, 2010-09-27 Notice of Intent to Issue a Reexam Certificate at pages 3-4 from the Reexamination of U.S. Patent No. 6,462,522, and the Declaration of Dr. Thomas Szepesi at pages 6-10, 26-31, 38-40 and the Declaration of Jean-Paul Clech at pages 17-20, 24-25 from the Reexaminations of U.S. Patent Nos. 6,462,522 and 6,278,264 for this term.</p>

	Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
			<p>Volterra may also rely on any characterizations of the Sicard Patent made by Infineon or any of its subsidiaries in any of the above for this term.</p> <p>Testimony of Dr. Thomas Szepesi regarding claim construction.</p> <p>Chapters 1, 4, 6 Chip On Board Technologies for Multichip Modules, John H. Lau (1994). VCA00003062-3229.</p> <p>Volterra may rely on expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>
3.	“frame”	<p>lead frame</p> <p><u>Intrinsic Support:</u> Specification of the '730 Patent: Abstract; 1:60 - 2:5; 2:63-67; 3:1-12; 3:17-20; 3:24-28; 4:61-62; and 5:4-11. Figure 2.</p> <p><u>Extrinsic Support:</u></p> <p>INF003759-INF003762, INF003769-</p>	<p>a support structure that includes connection portions for connecting to the bumps and other portions for connecting to a PCB</p> <p><u>Intrinsic Support:</u> '730 Patent at Abstract, 2:1-5, 2:16-19, 2:30-33, 2:63-68, 3:1-11, 3:13-23, 3:25-30, 3:44-56, 3:57-4:6, 4:30-34, 4:37-49, 4:58-60, 4:61-65, 5:4-11, Figs. 2, 3, 5, 7, Claims 9, 10</p> <p>“1. The following is an examiner's statement</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
	<p>INF003782, PRIM05898277, PRIM05897107-PRIM05897679, PRIM05897680-PRIM05898259, PRIM05896763-PRIM05896769, PRIM05896739-PRIM05896741, PRIM05896988- PRIM05897903, PRIM05896852- PRIM05896856, PRIM05896865- PRIM05896870, PRIM05896857- PRIM05896864.</p> <p>Testimony of Dr. Leonard Schaper regarding claim construction.</p> <p>Infineon may rely on Volterra's expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>	<p>of reasons for allowance: a number of prior art references made of record do not suggest a frame forms of high conductivity material, the frame comprising a plurality of first connection portions for connecting to the bumps of the first metal conductors and a plurality of second connection portions for connecting to the bumps of the second metal conductors, the frame providing external connections to the semiconductor regions of the device.” ‘730 Patent File History p. 56 of 65.</p> <p><u>Extrinsic Support:</u> Volterra may rely on the discussions or disclosures regarding chip packaging including flip-chip, wire bond, and tape automated bonding (TAB), and disclosures or discussions of frames, bonding and connection technologies in the publicly available version of Volterra's Opening Claim Construction Brief at pages 7-8 from Case 3:08-cv-05129-JCS (D.E. 502) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding chip packaging including flip-chip, wire bond, and tape automated bonding (TAB), and disclosures or discussions of frames, bonding and</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
		<p>connection technologies in the publicly available version of Volterra's Supplemental Reply Claim Construction Brief at pages 8-10 from Case 3:08-cv-05129-JCS (D.E. 595) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding chip packaging including flip-chip, wire bond, and tape automated bonding (TAB), and disclosures or discussions of frames, bonding and connection technologies in the publicly available version of the Claim Construction Order at page 22 from Case 3:08-cv-05129-JCS (D.E. 697) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding chip packaging including flip-chip, wire bond, and tape automated bonding (TAB), and disclosures or discussions of frames, bonding and connection technologies in the 2010-03-01 Amendment, Interview Summary, and Response to Office Action at pages 30-32 from the Reexamination of U.S. Patent No 6,278,264, 2010-09-27 Notice of Intent to Issue a Reexam Certificate at pages 3-4 from the Reexamination of U.S. Patent No. 6,462,522, and the Declaration of Dr. Thomas Szepesi at pages 26-31 and the</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
		<p>Declaration of Jean-Paul Clech at pages 3-14, 15-16, 22-26 from the Reexaminations of U.S. Patent Nos. 6,462,522 and 6,278,264 for this term.</p> <p>Volterra may also rely on any characterizations of the Sicard Patent made by Infineon or Primarion in any of the above for this term.</p> <p>Testimony of Dr. Thomas Szepesi regarding claim construction.</p> <p>Chapters 1, 6, Chip On Board Technologies for Multichip Modules, John H. Lau (1994). VCA00003062-3163, VCA00003206-3229.</p> <p>Volterra may rely on expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>
4. "connection portions"	<p>parts of the frame that extend across at least a portion of the die and are spaced apart from one another</p> <p><u>Intrinsic Support:</u> Specification of the '730 Patent: 3:1-5; 3:13-17; 3:44-48; 3:57-65; 4:61-62; and 5:4-</p>	<p>portions of the frame for connecting to the bumps</p> <p><u>Intrinsic Support:</u> '730 Patent at Abstract, 2:1-5, 2:16-19, 2:30-33, 2:63-68, 3:1-11, 3:13-23, 3:25-30, 3:44-56, 3:57-4:6, 4:30-34, 4:37-49, 4:58-60,</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
	<p>9. Figures 1-4.</p> <p><u>Extrinsic Support:</u> Testimony of Dr. Leonard Schaper regarding claim construction.</p> <p>Infineon may rely on Volterra's expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>	<p>4:61-65, 5:4-11, Figs. 2, 3, 5, 7, Claims 9, 10</p> <p>"1. The following is an examiner's statement of reasons for allowance: a number of prior art references made of record do not suggest a frame forms of high conductivity material, the frame comprising a plurality of first connection portions for connecting to the bumps of the first metal conductors and a plurality of second connection portions for connecting to the bumps of the second metal conductors, the frame providing external connections to the semiconductor regions of the device." '730 Patent File History p. 56 of 65.</p> <p><u>Extrinsic Support:</u> Volterra may rely on the discussions or disclosures regarding chip packaging including flip-chip, wire bond, and tape automated bonding (TAB), and disclosures or discussions of frames, bonding and connection technologies in the publicly available version of Volterra's Opening Claim Construction Brief at pages 7-8 from Case 3:08-cv-05129-JCS (D.E. 502) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding chip packaging</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
		<p>including flip-chip, wire bond, and tape automated bonding (TAB), and disclosures or discussions of frames, bonding and connection technologies in the publicly available version of Volterra's Supplemental Reply Claim Construction Brief at pages 8-10 from Case 3:08-cv-05129-JCS (D.E. 595) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding chip packaging including flip-chip, wire bond, and tape automated bonding (TAB), and disclosures or discussions of frames, bonding and connection technologies in the publicly available version of the Claim Construction Order at page 22 from Case 3:08-cv-05129-JCS (D.E. 697) for this term.</p> <p>Volterra may rely on the discussions or disclosures regarding chip packaging including flip-chip, wire bond, and tape automated bonding (TAB), and disclosures or discussions of frames, bonding and connection technologies in the 2010-03-01 Amendment, Interview Summary, and Response to Office Action at pages 30-32 from the Reexamination of U.S. Patent No 6,278,264, 2010-09-27 Notice of Intent to Issue a Reexam Certificate at pages 3-4 from</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
		<p>the Reexamination of U.S. Patent No. 6,462,522, and the Declaration of Dr. Thomas Szepesi at pages 26-31 and the Declaration of Jean-Paul Clech at pages 3-14, 15-16, 22-26 from the Reexaminations of U.S. Patent Nos. 6,462,522 and 6,278,264 for this term.</p> <p>Volterra may also rely on any characterizations of the Sicard Patent made by Infineon or Primarion in any of the above for this term.</p> <p>Testimony of Dr. Thomas Szepesi regarding claim construction.</p> <p>Chapters 1, 6, Chip On Board Technologies for Multichip Modules, John H. Lau (1994). VCA00003062-3163, VCA00003206-3229.</p> <p>Volterra may rely on expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>
5. "interdigitated"	<p>alternately arranged in adjacent rows</p> <p><u>Intrinsic Support:</u> Specification of the '730 Patent: 2:46-48 and 2:58-62.</p>	<p>structures of interlocking fingers</p> <p><u>Intrinsic Support:</u> '730 Patent at 1:8-12, 2:58-62</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
	<p>Figures 1, 4, and 5.</p> <p><u>Extrinsic Support:</u></p> <p>interdigitate: “to become interlocked like the fingers of folded hands” <i>Merriam Webster’s Collegiate Dictionary</i> (10th ed. 1993).</p> <p>interdigitate: “Interlock like the fingers of two clasped hands; project or be inserted alternately.” <i>Merriam Webster’s Collegiate Dictionary</i> (10th ed. 1993).</p> <p>INF003746 and INF003775.</p> <p>Testimony of Dr. Leonard Schaper regarding claim construction.</p> <p>Infineon may rely on Volterra’s expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties’ dispute regarding use of this material.</p>	<p><u>Extrinsic Support:</u></p> <p>Testimony of Dr. Thomas Szepesi regarding claim construction.</p> <p>McGraw-Hill Dictionary of Scientific and Technical Terms 1031 (5th ed. 1994)</p> <p>“interdigital structure [ELECTR] A structure in which the length of the region between two electrodes is increased by an interlocking-finger design for metallization of the electrodes.</p> <p>Also known as interdigitated structure.”</p> <p>VCA00003055-3057.</p> <p>The Oxford English Dictionary 1097 (2nd ed. 1998) “Interdigital 1. Situated between, or connecting, digits (fingers or toes). 2. Electronics. Having the form of or consisting of two similar series of parallel strips, those of each series forming part of a single structure and interdigitating with those of the other series: used of a kind of transducer.”</p> <p>VCA00003058-3061.</p> <p>Academic Press Dictionary of Science and Technology 1123 (1st ed. 1992) “interdigital structure Electronics. a type of circuit design in which the distance between two electrodes is lengthened by an interlocking-</p>

Claim Term, Phrase, or Clause	Infineon's Proposed Construction and Supporting Evidence ¹	Volterra's Proposed Construction and Supporting Evidence ²³
		finger structure.” VCA00003051-3054.
6. “bumps on the first metal conductors are substantially aligned in first lines which extend in a second direction” “bumps on the second metal conductors are substantially aligned in second lines which extend in the second direction”	<p>plain and ordinary meaning, except for “bumps” as addressed separately in this chart</p> <p><u>Intrinsic Support:</u> Specification of the '730 Patent: 3:30-43. Figures 1 and 4.</p> <p><u>Extrinsic Support:</u> Testimony of Dr. Leonard Schaper regarding claim construction.</p> <p>Infineon may rely on Volterra's expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>	<p>two-dimensional pattern of bumps where bumps to be connected to the frame are aligned in a direction different from the first direction</p> <p><u>Intrinsic Support:</u> '730 Patent at 3:1-11, 3:29-43, 3:30-38, 3:44-48, 3:57-4:6, 4:58-60, Figs. 1, 4, Claims 6, 7</p> <p><u>Extrinsic Support:</u> Volterra may rely on the discussions or disclosures regarding the orientation of the metallized pad pattern in the 2009-04-06 Replacement Request For Ex Parte Reexamination of U.S. Patent No. 6,278,264 at page 31 of the Reexamination for U.S. Patent No. 6,278,264 for this term.</p> <p>Testimony of Dr. Thomas Szepesi regarding claim construction.</p> <p>Volterra may rely on expert reports, pleadings, deposition and trial testimony, and other documents from case CV-08-5129 (JCS), pending resolution of the parties' dispute regarding use of this material.</p>